Atty. Docket No.: CA1427
PATENT APPLICATION

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No.: 09/839,952

REMARKS

Claims 1-2, 4-6, 8-13, 16-21, 24-29 and 32-34 are all the claims pending in the application. The Examiner rejected claims 1-2, 4-6, 8-13, 16-21, 24-29 and 32-34 as being allegedly anticipated by Yoshida et al. (U.S. patent No. 6,622,220). Applicant respectfully traverses this rejection in view of the following arguments.

Claims 1, 10, 18 and 26

With respect to independent claims 1, 10, 18 and 26, Applicant respectfully submits that Yoshida et al. does not teach or suggest at least several features of the invention specifically recited in the above claims.

In more detail, Yoshida et al. discloses a network attached storage device with VLAN support. The system of Yoshida et al. includes a storage device 140 connected to a VLAN-capable switch 110, see Figure 1. Specifically, VLAN technology splits a network into a plurality of VLAN segments 120. Hosts 105 operating on one VLAN segment 120 are capable to access only resources on the same VLAN segment and not on other segments. Yoshida et al. adds the storage device 140 to the aforesaid VLAN configuration, whereby different storage structures 135 within the storage device 140 are being associated with different VLAN segments 120. A client may access only a storage structure 135 which is associated with the specific VLAN segment on which that client resides. This achieves additional security of the system of Yoshida et al.

The Examiner seems to confuse the virtual local area network (VLAN) described in Yoshida et al. with the virtual private network (VPN) specifically recited in claims 1, 10, 18 and

26. In this regard, Applicant respectfully submits that VPN and VLAN are entirely different concepts. The specification of the present application at paragraph [0028] defines VPN in the following manner: "Virtual Private Network (VPN) is a network technology for obtaining private network like environments using a public network, such as the Internet. Two or more networks can connect via the Internet and communicate with each other as one private network using VPN."

As the Examiner would appreciate, VPN generally involves two parts: the protected or "inside" network that provides physical security and administrative security sufficing to protect transmission (somehow, it is not always the case), and a less trust-worthy or "outside" network or segment (Internet is the largest "jungle"). Generally, a firewall sits between a remote user's workstation or client and the host network or server. As the user's client establishes the communication with the firewall, the client may pass authentication data to an authentication service inside the perimeter. A known trusted person, sometimes only when using trusted devices, can be provided with appropriate security privileges to access resources not available to general users.

As would be appreciated by the Examiner, the VPN technology is entirely different from the VLAN technology and the two operate according to entirely different mechanisms. Therefore, the mentioning of VLAN in Yoshida et al. cannot be used to support rejection of claims 1, 10, 18 and 26 that specifically recite VPN, which, as stated above, is an entirely different technology.

For this reason, Applicant respectfully submits that Yoshida et al. fails to teach or suggest the Virtual Private Network program specifically recited in claims 1, 10, 18 and 26. To support a rejection under 35 U.S.C. 102, a reference must teach every single limitation recited in the claim. Yoshida et al. clearly does not meet this requirement. Therefore, claims 1, 10, 18 and 26 are not anticipated by Yoshida et al.

Claims 1, 10, 18 and 26 and 34

Furthermore, Applicant respectfully notes that independent claims 1, 10, 18, 26 and 34 recite several specific components of the inventive system, which are not disclosed in Yoshida et al. Specifically, the aforesaid claims recite a view table including 1) authorized user addresses, 2) virtual destination addresses corresponding to the user addresses, 3) destination addresses corresponding to the virtual destination addresses, 4) virtual volume IDs corresponding to the user addresses, and 5) volume IDs corresponding to the virtual volume IDs. This table is not taught or even suggested by Yoshida et al.

At page 2, paragraph 4 of the Office Action, the Examiner alleges that the aforesaid view table having the enumerated components is disclosed in Figure 1 and 6:27-45 of Yoshida et al. Applicant carefully examined the portions of Yoshida et al. cited by the Examiner, as well as the rest of that reference, but could not find anywhere the description of the above view table having the recited five components. Specifically, Figure 1 of Yoshida et al. shows VLAN switch 110, clients 105 and storage system 140. No table of any kind is shown. Yoshida et al. at 6:27-45, also cited by the Examiner, describes port translation table 145, which is a port-to-LAN table for

associating network ports with VLANs as well as access control list 150, which associates storage structures 135 with VLANs.

The above portions of Yoshida et al., cited by the Examiner in support of the rejection, do not contain any mention of: 1) authorized user addresses, 2) virtual destination addresses corresponding to the user addresses, 3) destination addresses corresponding to the virtual destination addresses, 4) virtual volume IDs corresponding to the user addresses, and 5) volume IDs corresponding to the virtual volume IDs. If the Examiner continues to insist that the above items 1) through 5) are disclosed in Yoshida et al., Applicant respectfully requests that the Examiner points to specific portions of Yoshida et al., where each of the above items 1) through 5) are disclosed.

When the PTO asserts that there is an explicit or implicit teaching or suggestion in the prior art, it must indicate where such teaching or suggestion appears in the reference. See In re Rijckaert, 28 U.S.P.Q.2d 1955,7 (Fed. Cir. 1993). The Examiner has clearly failed to do so. Therefore claims 1, 10, 18 and 26 and 34 are not anticipated by Yoshida et al. for this additional reason as well.

Claims 2, 4-6, 8-9, 11-13, 16-17, 19-21, 24-25, 27-29 and 32-33

With respect to Examiner's rejection of claims 2, 4-6, 8-9, 11-13, 16-17, 19-21, 24-25, 27-29 and 32-33, Applicant respectfully submits that these claims are patentable by definition, at least due to their dependence on the patentable independent claims 1, 10, 18 and 26.

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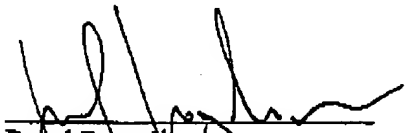
Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Pavel Pogodin
Registration No. 48,205

SUGHRUE MION, PLLC
Telephone: (650) 625-8100
Facsimile: (650) 625-8110
MOUNTAIN VIEW OFFICE
23493
CUSTOMER NUMBER

Date: [Press F11]

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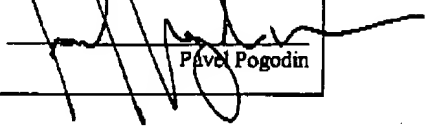

Pavel Pogodin